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6 Attorneys for KAREN GOWINS and Many Wildfire Victim Creditors

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
11

12 *In re:*

13 PG&E CORPORATION

14 -and-

15 PACIFIC GAS AND ELECTRIC
COMPANY

16 Debtors.

17 ☐ Affects PG&E Corporation

18 ☐ Affects Pacific Gas & Electric

19 ☒ Affects Both Debtors

20 *All papers shall be filed in the Lead Case,*
21 *No.19-30088 (DM)*

)
) **Case No. 19-30088 (DM)**
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)
) **SUPPLEMENTAL DECLARATION OF**
) **BONNIE E. KANE IN SUPPORT OF EX**
) **PARTE APPLICATION FOR AN ORDER**
) **SHORTENING TIME TO HEAR A**
) **MOTION FOR APPOINTMENT OF AN**
) **EXAMINER OF VOTING**
) **PROCEDURAL IRREGULARITIES**
) **PURSUANT TO SECTION 1104 (c) OF**
) **THE BANKRUPTCY CODE AND**
) **BANKRUPTCY RULE 2007.1**

) Date: TBD

) Time: TBD

) Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

22
23
24 I, Bonnie E. Kane, hereby declare under penalty of perjury that the following is true and
25 correct to the best of my knowledge, information and belief.

26 1. I am a partner in the Kane Law Firm, counsel to Creditor Karen Gowins and Many
27

28 **SUPPLEMENTAL DECLARATION OF BONNIE E. KANE IN SUPPORT OF EX PARTE APPLICATION FOR**
AN ORDER SHORTENING TIME TO HEAR A MOTION FOR APPOINTMENT OF AN EXAMINER OF
VOTING PROCEDURAL IRREGULARITIES PURSUANT TO SECTION 1104 (c) OF THE BANKRUPTCY
CODE AND BANKRUPTCY RULE 2007.1

1 Fire Victim Creditors in the above referenced matter.

2 2. I emailed **Mr. Karotkin, who represents the debtors** yesterday and also spoke with him
3 on the telephone. He stated **he would not agree to an order shortening time** and confirmed that
4 in an email.

5 3. Yesterday, I emailed Ms. Erin Dexter at Millbank and I also left a voice mail for Mr.
6 William Bice, also of Milbank. **Ms. Dexter emailed back stating the Unsecured Creditors**
7 **Committee “will take no position on the motion to shorten time.”**

9 4. I emailed Mr. Robert Julian who represents the Official Committee of Tort Claimants
10 (TCC) and I telephoned him as well. He did not answer and I left a detailed message. On May
11 20, 2020, I telephoned Mr. Julian again. I also emailed him again and added two of the other
12 bankruptcy attorneys at Baker Hostetler who have been providing advice to the TCC. **Ms.**
13 **Elizabeth Green of Baker Hostetler who represents the TCC** responded to my inquiry as
14 follows: **“If the judge is inclined to set these dates, we do not object.”**

16 5. Yesterday I emailed **Mr. Timothy Laffredi, Assistant U.S. Trustee**. On the same date, I
17 also telephoned Mr. Laffredi and left a detailed message. On May 20, 2020, I received the
18 following email from **Mr. Laffredi**: **“We consent to having your motion heard on shortened**
19 **time. Thank you for reaching out.”**

21 6. My emails contained the Ex Parte Application and the Motion for Appointment of An
22 Examiner, as well as my Declaration supporting that motion without exhibits.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States that the foregoing is true and correct. Executed on May 20, 2020 at San Diego, California.

25 _____
26 /s/ Bonnie E. Kane

27 BONNIE E. KANE

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SUPPLEMENTAL DECLARATION OF BONNIE E. KANE IN SUPPORT OF EX PARTE APPLICATION FOR
AN ORDER SHORTENING TIME TO HEAR A MOTION FOR APPOINTMENT OF AN EXAMINER OF
VOTING PROCEDURAL IRREGULARITIES PURSUANT TO SECTION 1104 (c) OF THE BANKRUPTCY
CODE AND BANKRUPTCY RULE 2007.1